

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS, :
and VERIZON COMMUNICATIONS INC., :

Petitioners, :

vs. :

PATRICIA BROWN, HAROLD P. SCHROER, and :
DAWN M. ZOBRIST, on an individual basis and on :
behalf of others similarly situated, :

Respondents. :

No. 08 CV 427 (LAK)

**NOTICE OF MOTION
TO FILE DOCUMENTS
UNDER SEAL**

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PLEASE TAKE NOTICE that upon the annexed Declaration of Jonathan H. Blavin and the accompanying memorandum of law, petitioners Cellco Partnership d/b/a Verizon Wireless and Verizon Communications Inc. will move before this Court, at a date, time and place to be set by the Court, for an order granting Petitioners leave to file under seal the Declaration of Jonathan H. Blavin in Support of Petitioners' Motion to Vacate Class Determination Award including unredacted copies of its exhibits, and granting Petitioners such other and further relief as the Court may deem just and proper. A redacted copy has been filed for the public record.

Dated: New York, New York
February 11, 2008

Respectfully submitted,

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Attorneys for Petitioners Cellco Partnership d/b/a Verizon Wireless
and Verizon Communications Inc.

CERTIFICATE OF SERVICE

I, Carl Micarelli, a member of the Bar of this Court, certify as follows:

On this 11th day of February 2008, I served the within Notice of Motion to File Documents Under Seal, Declaration of Jonathan H. Blavin in Support of Petitioners' Motion to File Documents Under Seal, and Memorandum of Law in Support of Petitioners' Motion to File Documents Under Seal upon Scott A. Bursor, counsel for the Respondents, by sending a copy by electronic mail to scott@bursor.com, such means of service being an electronic means to which he has consented in writing pursuant to Rule 5(b)(2)(E) of the Federal Rules of Civil Procedure.

Dated: New York, New York
February 11, 2008

A handwritten signature in cursive script, reading "Carl Micarelli", is written above a horizontal line.

Carl Micarelli